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From: Tamara Daw

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REMARKS

Original claims 1-37 are pending in the above-referenced patent application. Claims 38-69 have been added. Claim 17 has been cancelled, and claims 1-16, and 18-37 have been amended. No new matter has been added.

Claim rejections - 35 USC §102(b)

Claims 1-8, 12, 14, 15, 20, 23, 24, 27, and 31 are rejected under 35 U.S.C. 102(b) as being anticipated by Egawa (5,138,460). Regarding amended claim 1, the Assignee respectfully submits Egawa does not anticipate newly amended claim 1.

Specifically, amended independent claim 1 recites "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates," the limitation from original claim 17. Egawa does not teach or suggest "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates." Egawa makes no mention or teaching of a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates, as required by now amended claim 1. The Examiner is kindly reminded that:

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. MPEP § 2131.01. Furthermore, the identical invention must be shown in as complete detail as in the . . . claim. MPEP § 2131.01.

Since the combination of Egawa, Dunton, and Kang does not teach or suggest "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates," the combination of Egawa, Dunton, and Kang does not contain each and every element of the rejected independent claim 1 and dependent claims 2-8, 12, 14, 15, 20, 23, 24, 27, and 31 and, therefore, does not anticipate claims 1-8, 12, 14, 15, 20, 23, 24, 27, and 31.

The Assignee respectfully submits in light of the foregoing that amended independent claim 1 is allowable over the combination of Egawa, Dunton, and Kang. Because claims 2-8, 12, 14, 15, 20, 23, 24, 27, and 31 depend from allowable claim 1, the Assignee submits they are also

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allowable. Assignee respectfully submits claims 1-8, 12, 14, 15, 20, 23, 24, 27, and 31 are allowable, and respectfully requests they be allowed.

Claim rejections - 35 USC §103(a)

Claims 9-11, 25, and 26 are rejected under 35 U.S.C. 103(a) as being unpatentable over Egawa. It is respectfully submitted that the Examiner has not established a *prima facie* case of obviousness. The Examiner is reminded yet again that:

To establish a prima facie case of obviousness, three basic criteria must be met. MPEP §2142 and §2143. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on the Assignee's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). The initial burden is on the Examiner to provide some suggestion of the desirability of doing what the inventor has done. "To support the conclusion the claimed invention is directed to obvious subject matter, either the references expressly or implicitly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why an artisan would have found the claimed invention to have been obvious in light of the teachings of the references." Ex parte Clapp, 227 USPQ 972, 973 (Bd. Pat. App.& Inter. 1985).

As discussed above, Egawa does not disclose "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as required by claim 1 of the present disclosure. Furthermore, neither Dunton nor Kang disclose the above element of claim 1. Therefore, any combination of Egawa, Dunton, and/or Kang would not yield all of the elements of claim 1. Assignee further contends that no suggestion, teaching, or motivation exists for combining the cited patents.

For these reasons, Assignee respectfully submits the Examiner has failed to establish a prima facie case of obviousness as to independent claim 1. Assignee submits it is allowable, and respectfully requests it be allowed. Because dependent claims 9-11, 25, and 26 depend from allowable claim 1, Assignee respectfully submits they are allowable, and requests they also be allowed.

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Claims 13 and 28 are rejected under 35 U.S.C. 103(a) as being unpatentable over Egawa as applied to claims 1-8, 12, 14, 15, 20, 23, 24, 27, and 31 above, and further in view of Inoue of record (6,144,804). It is respectfully submitted that the Examiner has yet again not established a prima facie case of obviousness.

Specifically, as discussed above, as to claim 1, the combination of Egawa, Dunton, and Kang does not disclose "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as required by claim 1 of the present disclosure. This deficiency is not abated by the addition of Inoue.

For this reason, Assignee respectfully submits the Examiner has failed to establish a prima facie case of obviousness as to independent claim 1. Assignee submits it is allowable, and respectfully requests it be allowed. Because dependent claims 13 and 28 depend from allowable claim 1, Assignee respectfully submits they are allowable, and requests they also be allowed.

Claims 16, 18 and 35-37 are rejected under 35 U.S.C. 103(a) as being unpatentable over Egawa as applied to claims 1-8, 12, 14, 15, 20, 23, 24, 27, and 31 above, and further in view of Dunton et al of record (6,304,284). It is respectfully submitted that the Examiner has not established a *prima facie* case of obviousness.

Specifically, as to claim 1, the combination of Egawa, Dunton, and Kang does not disclose "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as required by claim 1.

For this reason, Assignee respectfully submits the Examiner has failed to establish a prima facie case of obviousness as to independent claim 1. Assignee submits it is allowable, and respectfully requests it be allowed. Because dependent claims 16, 18 and 35-37 depend from allowable claim 1, Assignee respectfully submits they are allowable, and requests they also be allowed.

Claims 17 and 21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Egawa and Dunton et al as applied to claims 1-8, 12, 14-16, 18, 20, 23, 24, 27, 31 and 35-37 above, and

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further in view of Kang et al of record (6,256,058). It is respectfully submitted that the Examiner has yet again not established a *prima facie* case of obviousness.

Specifically, as to claim 1, the combination of Egawa, Dunton, and Kang does not disclose "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as required by claim 1. This deficiency is not abated by the addition of Kang. Kang makes no mention or teaching of a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates, as required by amended claim 1.

For this reason, Assignee respectfully submits the Examiner has failed to establish a prima facie case of obviousness as to independent claim 1. Assignee submits it is allowable, and respectfully requests it be allowed. Because dependent claims 17 and 21 depend from allowable claim 1, Assignee respectfully submits they are allowable, and requests they also be allowed.

Claim 19 is rejected under 35 U.S.C. 103(a) as being unpatentable over Egawa as applied to claims 1-8, 12, 14, 15, 20, 23, 24, 27, and 31 above, and further in view of Dube et al of record (6,269,144). It is respectfully submitted that the Examiner has not established a *prima* facie case of obviousness.

Specifically, as to claim 1, the combination of Egawa, Dunton, and Kang does not disclose "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as required by claim 1.

This deficiency is not abated by the addition of Dube, because Dube does not disclose or suggest "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as claimed in claim 1.

For this reason, Assignee respectfully submits the Examiner has failed to establish a prima facie case of obviousness as to independent claim 1. Assignee submits it is allowable, and respectfully requests it be allowed. Because dependent claim 19 depends from allowable claim 1, Assignee respectfully submits it is allowable, and requests it also be allowed.

Claim 22 is rejected under 35 U.S.C. 103(a) as being unpatentable over Egawa and Dunton et al as applied to claims 1-8, 12, 14-16, 18, 20, 23, 24, 27, 31, and 35-37 above, and further in veiw of Dube et al of record (6,269,144). It is respectfully submitted that the Examiner has not established a *prima facte* case of obviousness.

Specifically, as to claim 1, the combination of Egawa, Dunton, and Kang does not disclose "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as required by claim 1 of. This deficiency is not abated by the addition of Dunton and Dube, because neither Dunton nor Dube disclose or suggest "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as claimed in claim 1.

For this reason, Assignee respectfully submits the Examiner has failed to establish a prima facie case of obviousness as to independent claim 1. Assignee submits it is allowable, and respectfully requests it be allowed. Because dependent claim 22 depends indirectly from allowable claim 1, Assignee respectfully submits claim 22 is allowable, and requests it also be allowed.

Claims 29 and 30 are rejected under 35 U.S.C. 103(a) as being unpatentable over Egawa as applied to claims 1-8, 12, 14, 15, 20, 23, 24, 27, and 31 above, and further in view of Anderson (6,657,667). It is respectfully submitted that the Examiner has not established a *prima* facie case of obviousness.

Specifically, as to claim 1, the combination of Egawa, Dunton, and Kang does not disclose "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as required by claim 1. This deficiency is not abated by the addition of Anderson, because Anderson does not disclose or suggest "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as claimed in claim 1.

For this reason, Assignee respectfully submits the Examiner has failed to establish a prima facie case of obviousness as to independent claim 1. Assignee submits it is allowable, and

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respectfully requests it be allowed. Because dependent claims 29 and 30 depend from allowable claim 1, Assignee respectfully submits they are allowable, and requests they also be allowed.

Claims 32 and 33 are rejected under 35 U.S.C. 103(a) as being unpatentable over Egawa as applied to claims 1-8, 12, 14, 15, 20, 23, 24, 27, and 31 above, and further in view of Truc et al of record (6,268,936). It is respectfully submitted that the Examiner has not established a prima facie case of obviousness.

Specifically, as to claim 1, the combination of Egawa, Dunton, and Kang does not disclose "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as required by claim 1. This deficiency is not abated by the addition of Truc, because Truc does not disclose or suggest "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as claimed in claim 1.

For this reason, Assignee respectfully submits the Examiner has failed to establish a *prima facie* case of obviousness as to independent claim 1. Assignee submits it is allowable, and respectfully requests it be allowed. Because dependent claims 32 and 33 depend from allowable claim 1, Assignee respectfully submits they are allowable, and requests they also be allowed.

Claim 34 is rejected under 35 U.S.C. 103(a) as being unpatentable over the combination of Egawa and True at al as applied to claims 1-8, 12, 14, 15, 20, 23, 24, 27, and 31-33 above, and further in view of Yui et al of record (US 2002/0175924 A1). It is respectfully submitted that the Examiner has not established a *prima facie* case of obviousness.

Specifically, as to claim 1, the combination of Egawa, Dunton, and Kang does not disclose "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as required by claim 1. This deficiency is not abated by the addition of Yui, because Yui does not disclose or suggest "a rectilinear-to-cylindrical conversion circuitry for converting the first and second fields of view from rectilinear coordinates to cylindrical coordinates" as claimed in claim 1.

For this reason, Assignee respectfully submits the Examiner has failed to establish a prima facie case of obviousness as to independent claim 1. Assignee submits it is allowable, and respectfully requests it be allowed. Because dependent claim 34 depends from allowable claim 1, Assignee respectfully submits claim 34 is allowable, and requests it also be allowed.

It is noted that claimed subject matter may be patentably distinguished from the cited patents for additional reasons; however, the foregoing is believed to be sufficient. Likewise, it is noted that the Assignee's failure to comment directly upon any of the positions asserted by the Examiner in the office action does not indicate agreement or acquiescence with those asserted positions.

New claims

New Claims 38-69 have been added. Claims 38-69 are primarily based upon claims 1-37, the original specification, and drawings. Assignee submits no new matter has been added by the addition of these claims.

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Conclusion

In view of the foregoing, it is repectfully submitted that all of the claims pending in this patent application are in condition for allowance. If the Examiner has any quesitons, she is invited to contact the undersigned at (503) 439-6500. Reconsideration of this patent application and allowance of all the claims is respectfully requested.

Please charge any shortages and credit any overages of any fees required for this submission to Deposit Account number 50-3703.

Respectfully submitted,

Berkeley Law and Technology Group, LLC

Dated: 2-7-06

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